

## **Exhibit 3**

**UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF TEXAS  
AUSTIN DIVISION**

NATIONAL ASSOCIATION OF  
SCHOLARS,

Plaintiff,

v.

UNITED STATES DEPARTMENT OF  
ENERGY, JENNIFER GRANHOLM, in her  
official capacity as Secretary of Energy, and  
GERALDINE RICHMOND, in her official  
capacity as Under Secretary for Science and  
Innovation,

Defendants.

Case No. 25-cv-00077

**DECLARATION OF NAS MEMBER A**

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I, [REDACTED] declare as follows:

1. I have personal knowledge of the facts set forth in this declaration and, if called as a witness, could and would competently testify the same.
2. I am resident of Texas, within the Austin Division of the Western District of Texas, and have been so for the past 24 years.
3. I have been a member of the National Association of Scholars ("NAS") for 13 years and believe in the mission and goals promoted by NAS.
4. I am a professor of electrical engineering at a large public university in Texas and have been a faculty member there for over 24 years.
5. Over the past 30 years I have applied for and received grants for scientific research from various federal agencies including the Department of Energy, the National Science Foundation and the Department of Defense.
6. I have received research funding from the Department of Energy regarding technology transfer issues which resulted in the publication of academic papers.
7. In 2023 I applied for a research grant from the United States Air Force, but later I was informed that the Air Force lacked funding for the research so I never received the grant.
8. In my career, as Principal Investigator I have received research funding from federal agencies for three research projects.
9. I am currently conducting preliminary research on a unique atmospheric phenomenon that I believe would be a research topic that could merit funding from the Department of Energy.
10. I will not seek funding from the Department of Energy because I refuse to submit a Diversity, Equity and Inclusion ("DEI") statement and I believe the Department's Office of Science Promoting Inclusive and Equitable Research (PIER) plan requirement is a DEI statement.

11. I don't believe in DEI statements or the promotion of DEI in higher education because I believe it politicizes science and is contrary to individual merit and achievement, and is also contrary to equality of opportunity, which I fully support.

12. I believe that the promotion of DEI goals and principles frequently undermines the pursuit of scientific and academic excellence.

13. I fully support the efforts of NAS to investigate and report on DEI within higher education and especially within the Science, Technology, Engineering and Math ("STEM") disciplines.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed on January 2, 2025, in [REDACTED] Texas.

[REDACTED]  
[REDACTED] (Member A)